

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

OLD BBP, INC., *et al.*,¹

Debtors.

DON A. BESKRONE, SOLELY IN HIS
CAPACITY AS THE CHAPTER 7 TRUSTEE
OF OLD BBF, LLC,

Plaintiff,

v.

KENNETH WORSHAM AND WALTER
SCOTT CAMERON,

Defendants.

Chapter 7

Case No. 19-12502 (LSS)

(Jointly Administered)

Adv. Proc. No. _____

COMPLAINT

**THIS COMPLAINT AND ALL
EXHIBITS ARE FILED UNDER SEAL**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Old BBP, Inc. (f/k/a Bumble Bee Parent, Inc.) (5118); Old BBH, Inc. (f/k/a Bumble Bee Holdings, Inc.) (1051); Old BBF, LLC (f/k/a Bumble Bee Foods, LLC) (0146); Old AF, LLC (f/k/a Anova Food, LLC) (2140); and Old BBC Corp. (f/k/a Bumble Bee Capital Corp.) (7816). The mailing address for the above-captioned Debtors is Old BBP, Inc., *et al.*, Attn: Albert Altro, Chief Wind Down Officer, Traverse LLC, 300 Spectrum Center Dr., Suite 400, Irvine, California 92618.

Dated: November 21, 2021
Wilmington, Delaware

ASHBY & GEDDES, P.A.

/s/ Stacy L. Newman

Gregory A. Taylor (#4008)

Stacy L. Newman (#5044)

F. Troupe Mickler IV (#5361)

Randall J. Teti (#6334)

500 Delaware Avenue, 8th Floor

Wilmington, DE 19899

Telephone: (302) 654-1888

Facsimile: (302) 654-2067

Email: gtaylor@ashbygeddes.com

snewman@ashbygeddes.com

tmickler@ashbygeddes.com

*Counsel to Don A. Beskrone, Chapter 7
Trustee of the Debtors*